



April 16, 2019

VIA ECF AND EMAIL

Honorable Barbara C. Moses
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 740
New York, NY 10007

Re: *Jane Doe v. Skyline Automotive Inc., et al.*
Civil Case No. 18-cv-4418

Dear Magistrate Judge Moses:

This firm represents the Plaintiff in the above-referenced matter. The parties write jointly, pursuant to Your Honor's Individual Rules of Practice, Rule II(A), to respectfully request an adjournment of the initial case management conference, and associated pre-conference filing deadlines, from April 30, 2019 to May 30, 2019 or the next date available for the Court after May 30, 2019. This is the first request for an adjournment of this conference.

The reason for the parties' joint request is that the parties have been engaged in settlement discussions since the Southern District mediation, and are very close to reaching an agreement in principle. As such, in order that we may bridge any gaps and formalize a settlement should one be reached, we respectfully request that the Court adjourn the initial case management conference, and associated pre-conference filing deadlines, from April 30, 2019 to May 30, 2019 or the next date available for the Court after May 30, 2019. Should the parties ultimately reach a settlement in principle, we will inform the Court.

We thank the Court for its time and attention to this matter.

Respectfully submitted,
DEREK SMITH LAW GROUP, PLLC
/s/ Abe Melamed
Abraham Z. Melamed, Esq.

CC: All Counsel (Via ECF)